

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TENNESSEE AT CHATTANOOGA**

TERPSEHORE MARAS,

*Plaintiff,*

v.

CHATTANOOGA NEWS CHRONICLE,  
THEHUFFINGTONPOST, INC.,  
REPRESENTATIVE STEVE COHEN,  
US DOMINION, INC., DOMINION VOTING  
SYSTEMS, INC., DOMINION VOTING  
SYSTEMS CORPORATION, MEDIA  
MATTERS FOR AMERICA, OHIO  
INTELLIGENCE TIPS, ROSS ELDER,  
and ALI ABDUL RAZAQ AKBAR A/K/A  
ALI ALEXANDER,

*Defendants.*

Civil Action No. 1:21-cv-317

**DECLARATION OF MEGAN L. MEIER IN SUPPORT OF DOMINION'S  
MOTION TO DISMISS**

I, Megan L. Meier, declare as follows:

1. I am an adult resident of Washington, D.C. and am otherwise competent to make this declaration.
2. I have personal knowledge of all facts set forth below, and if called upon to do so, I could and would competently testify thereto.
3. I am a partner in the law firm Clare Locke LLP ("Clare Locke") with the principal place of business at 10 Prince St., Alexandria, Virginia 22314.

4. US Dominion, Inc. and its subsidiaries, Dominion Voting Systems, Inc. and Dominion Voting Systems Corporation, retained Clare Locke to represent them in defamation matters.

5. The December 16, 2020 retraction demand letter sent to Sidney Powell was primarily drafted in and sent from the Washington, D.C. metropolitan area to Sidney Powell in Texas. No actions regarding the preparation or sending of the letter were done in Tennessee. A true and correct copy is attached as **Exhibit A**.

6. The December 17, 2020 press release was primarily drafted in the Washington, D.C. metropolitan area and published from Washington, D.C. and Toronto. No actions regarding the preparation or publication of the press release were done in Tennessee. A true and correct copy is attached as **Exhibit B**.

7. The January 8, 2021 press release was primarily drafted in the Washington, D.C. metropolitan area and published from the Washington, D.C. metropolitan area and Toronto. No actions regarding the preparation or publication of the press release were done in Tennessee. A true and correct copy is attached as **Exhibit C**.

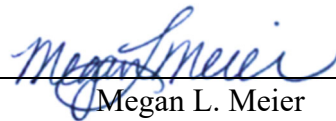
8. Dominion's defamation complaint against Sidney Powell was filed in the United States District for the District of Columbia, No. 1:21-cv-00040, on January 8, 2021. It was primarily drafted in the Washington, D.C. metropolitan area. No actions regarding the preparation or filing of the complaint were done in Tennessee. A true and correct copy is attached as **Exhibit D**.

9. A true and correct copy of the Order dated December 9, 2020 issued by the United States District Court for the District of Arizona in the case of *Bowyer v. Ducey*, No. 20-cv-2321, is attached as **Exhibit E**.

10. A true and correct copy of the Opinion and Order dated August 25, 2021 issued by the United States District Court for the Eastern District of Michigan in the case of *King v. Whitmer*, No. 20-cv-13134, is attached as **Exhibit F**.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed this 13th day of January 2022, in Alexandria, Virginia.

By:   
Megan L. Meier

### **CERTIFICATE OF SERVICE**

I hereby certify that on January 20, 2022, a copy of the foregoing was filed via the Court's CM/ECF system which will send notice of this filing via electronic mail notice to the following:

Russell A. Newman The Newman Law Firm 6688 Nolensville Road Suite 108-22 Brentwood, TN 37027 russell@thenewmanlawfirm.com	Todd Tatelman Sarah Clouse United States House of Representatives, General Counsel 219 Cannon House Office Building Washington, DC 20515 202-225-9700 todd.tatelman@mail.house.gov sarah.clouse@mail.house.gov
Douglas N. Letter Office of General Counsel U.S. House of Representatives 5140 O'Neill House Office Building Washington, D.C. 20515 (202) 225-9700 Douglas.Letter@mail.house.gov	Robb S Harvey Waller, Lansden, Dortch & Davis, LLP (Nashville) Nashville City Center 511 Union Street Suite 2700 Nashville, TN 37219-8966 615-244-6380 615-244-6804 (fax) robb.harvey@wallerlaw.com

And sent via U.S. Mail to the following:

MEDIA MATTERS FOR AMERICA 75 Broadway Street, Suite 202 San Francisco, CA 94111	ALI ABDUL RAZAQ AKBAR A/K/A ALI ALEXANDER 5125 Pinellas Avenue Keller, TX 76244
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/s/ W. Scott Sims  
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W. Scott Sims